

IN THE COURT OF COMMON PLEAS, PIKE COUNTY, OHIO

STATE OF OHIO,	:	Case No. 2019CR000068
	:	
PLAINTIFF,	:	JUDGE CHRIS A. MARTIN
	:	
vs.	:	
	:	
CHARLES S. READER,	:	BILL OF PARTICULARS
	:	
DEFENDANT.	:	

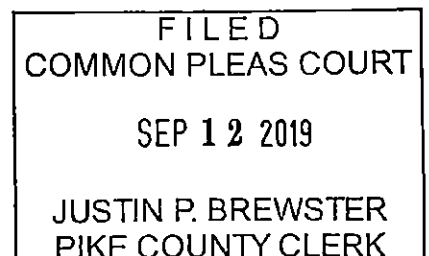
Now comes the State of Ohio pursuant to Criminal Rule 7(E), and hereby responds to Defendant's demand for a Bill of Particulars.

COUNTS ONE, TWO AND THREE:

On June 22, 2017 Pike County Sheriff, Charles Reader seized \$6,020.00 in cash from a structure at 188 Rainbow Trail, Waverly, Ohio as possible proceeds of drug trafficking. These funds were later counted by then Lt. Burchett and Deputy Cottrill. The cash count was video recorded. The funds were sealed in an evidence bag and the bag was turned over to Charles Reader by Lt. Burchett. The funds were to be maintained in the safe in Sheriff Reader's office.

On December 13, 2018, investigators for the Auditor of State's Office (AOS) executed a search warrant in Sheriff Reader's office, including the aforementioned safe. No funds or evidence bags were found in the safe. Sheriff Reader was present during the execution of the search warrant.

Soon after, attorney James Boulger contacted AOS to advise that Sheriff Reader had possession of some items which should have been in the safe. Arrangements were made to pick those items up at Mr. Boulger's office on December 20, 2018.



On December 20, 2018, Chief Michael Spiert and Rich Blakesley of AOS met with Mr. Boulger and Sheriff Reader at Mr. Boulger's office at 45 West Fourth Street, Chillicothe, Ohio. At that time Boulger and Reader provided Spiert and Blakesley with an accordion file which contained fourteen (14) evidence bags, each of which contained U.S. currency.

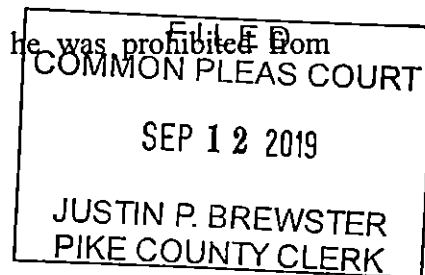
After taking custody of the accordion file and its contents, Spiert and Blakesley placed these items in the AOS secured property room. AOS investigators obtained the case files for the 14 evidence bags received. The file for the funds seized from 188 Rainbow Trail on June 22, 2017 included the video recording of the counting of the funds. From the video, it was clear the twenty dollar bills which were seized were old, well circulated bills. The twenty dollar bills contained in the evidence bag from Sheriff Reader and Mr. Boulger were a very tight stack of uncirculated bills, not the bills counted during the video recorded cash count.

The evidence bag also gave the appearance of having been opened and resealed. There were no markings on the evidence bag to document the opening and resealing. Sheriff Reader never advised Spiert or Blakesley of the changing of the bills or the opening of the evidence bag at the time he turned this evidence over to them. The evidence was being received by them as evidence in an ongoing criminal investigation.

#### COUNTS FOUR, FIVE, SIX, SEVEN AND EIGHT

On June 29, 2015, the Pike County Sheriff's Office impounded a 2013 Nissan Versa in a traffic stop. On June 30, 2016, the Pike County Sheriff's Office was issued a salvage title for the vehicle based on an Unclaimed or Abandoned Junk Motor Vehicle Affidavit. The vehicle was scheduled to be sold at a Sheriff's office auction on August 19, 2017.

Prior to the auction, Sheriff Reader requested Frederick Foill to purchase the 2013 Nissan Versa on behalf of Reader's daughter, since, according to Reader, he was prohibited from



purchasing a vehicle at the auction. Reader provided Foill with \$3,500.00 with which to bid on the vehicle. Also prior to the auction, Sheriff Reader directed Cpl. Adam Ball to “dull down” the vehicle and dirty it up to keep the purchase price down. At the auction, the vehicle was announced to be “without a key” even though the Pike County Sheriff’s Office was in possession of the key to the vehicle.

Mr. Foill successfully bid on the vehicle for \$2,000.00. Thomas Brewster, the auctioneer, was interested purchasing in the vehicle but did not due to the apparent unavailability of a key. He advised he would have bit up to \$3,000.00 on the vehicle had there been a key. He further advised that, based on his experience, the vehicle could have sold to up to \$4,000.00 or more with a key.

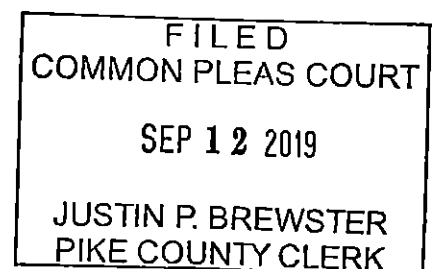
Mr. Foill attempted to secure title to the vehicle but could not. The County Commissioners heard that the vehicle was being driven by Sheriff Reader’s daughter and did not believe he was allowed to purchase the vehicle at the Sheriff’s auction, thus they would not transfer title to Foill. They were later advised to by County Prosecutor Rob Junk. They then transferred the title to Foill.

In October of 2017, Sheriff Reader and his daughter advertised the vehicle for sale on Facebook. Sheriff Reader arranged to sell the vehicle to Carla Webb for \$5,500.00.

The Pike County Commissioners and Prosecutor Junk advised that had they been aware of the efforts by Sheriff Reader to depress the value of the vehicle at the auction, they would not have transferred title to Foill for Reader’s benefit.

#### COUNTS NINE, TEN AND ELEVEN

On April 19, 2016 the Pike County Sheriff’s office impounded 1991 Chevrolet Silverado pickup truck. On May 2, 2017 the Pike County Sheriff’s office was issued a title for the vehicle. On August 19, 2017, the vehicle was sold at the Sheriff’s office auction, previously referenced in the discussion of the 2013 Nissan Versa.



Linda Crews, AKA Adelle Crews, and her then boyfriend, John Koeppel, attended the auction. John Koeppel was a Pike County Special Deputy. Sheriff reader approached Ms. Crews and asked her if she would purchase the 1991 Chevrolet Silverado on his behalf for a family member since, according to Reader, he was prohibited from purchasing a vehicle at the auction. Ms. Crews agreed to do so. Reader advised her that he would be willing to bid \$300.00 for the vehicle.

Ms. Crews bid on the vehicle, but had to bid \$350.00 to obtain the vehicle. Special Deputy Koeppel paid the \$350.00 for the vehicle.

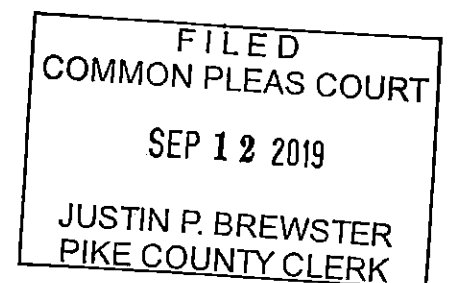
Ms. Crews never received title to the vehicle. Ms. Crews and Mr. Koeppel went to the Pike County Sheriff's Office about four weeks later to try to obtain the title. They were advised by Pike County Sheriff's Office secretary Theresa Parmeter that Sheriff Reader had previously instructed her to place the title to the vehicle in the name of Blaise Reader, Sheriff Reader's father. The title to the vehicle reflects that on December 15, 2017, Ms. Parmeter notarized the title to the vehicle listing the owner as Blaise Reader. Charles reader signed the title authorizing the transfer of the title from the Pike County Sheriff's Office to Blaise Reader.

Neither Ms. Crews nor Mr. Koeppel have ever been repaid the \$350.00 by Sheriff Reader.

COUNTS TWELVE, THIRTEEN, FOURTEEN, FIFTEEN AND SIXTEEN

During 2017 and 2018, Sheriff Reader borrowed funds from several employees of the Pike County Sheriff's office and from Frederick Foill, a local area businessman who has regularly conducted business with Pike County and specifically with the Pike County Sheriff's Office.

On or about June 26, 2017, Sheriff Reader accepted a loan of \$1,500.00 from Pike County Sheriff's office employee William Stansberry.



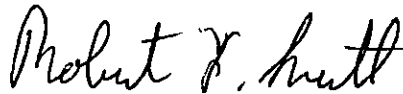
On or about October 18, 2017, Sheriff Reader accepted a loan of \$1,000.00 from Frederick Foill.

On or about May 1, 2018 to June 30, 2018, Sheriff Reader accepted a loan of \$2,500.00 from Pike County Sheriff's Office employee Ryan Bentley.

On or about August 7, 2018, Sheriff Reader accepted a loan of \$2,000.00 from Pike County Sheriff's Office employee Jim Dixon.

On or about August 26, 2018, Sheriff Reader accepted a loan of \$1,000.00 from Frederick Foill.

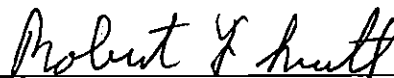
Respectfully submitted,



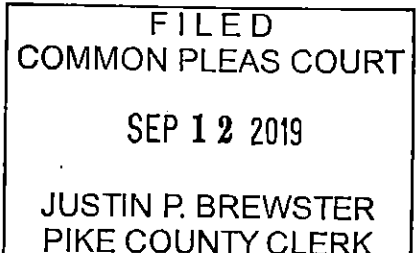
ROBERT F. SMITH (0023434)  
Special Prosecutor for Pike County  
88 East Broad Street, Ninth Floor  
Columbus, Ohio 43215  
Direct: (614) 728-7100  
Counsel for the State of Ohio

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing was served via email and ordinary U.S. mail, postage prepaid, to James T. Boulger, Counsel for Charles S. Reader, 45 West Fourth Street, Chillicothe, OH 45601, this 11<sup>th</sup> day of September, 2019.



ROBERT F. SMITH (0023434)  
Special Prosecutor for Pike County



# Fax Call Report

HP LaserJet M4555 MFP

Page 1

## Fax Header Information

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OHIO AUDITOR OF STATE  
KEITH FABER

## FAX TRANSMITTAL COVER SHEET

To: Pike County Clerk of Courts

Fax Number: 740-947-1729

From: Cheryl Gray, Administrative Assistant

Date: September 11, 2019

Total Number of Pages: 6  
(Including Cover Sheet)

### Notes

Re: *SOH vs. Charles S. Reader*  
Case No. 2019CR000068

Please file the attached *State of Ohio's Bill of Particulars* in the above-captioned matter.  
Original to follow via overnight delivery.

Thank you!

IF THERE ARE ANY PROBLEMS WITH THE TRANSMISSION,  
PLEASE CALL Cheryl Gray @ (614) 728-7268

88 East Broad Street, Columbus, Ohio 43215  
Phone: 614-466-4514 or 800-282-0370  
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COMMON PLEAS COURT

SEP 12 2019

JUSTIN P. BREWSTER  
PIKE COUNTY CLERK